

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ALEXYS TAYLOR, *et al.*, )  
Plaintiff, ) Case No. 1:21-CV-04019  
v. ) Hon. Judge Robert M. Dow, Jr.  
ALCON VISION, LLC, )  
Defendant. )

**ALCON VISION, LLC'S UNOPPOSED MOTION TO STAY PROCEEDINGS AND  
DEADLINES TO FINALIZE SETTLEMENT**

Defendant Alcon Vision, LLC (“Alcon”), by and through undersigned counsel, respectfully moves this Court to stay this matter in its entirety for sixty (60) days, including extending all deadlines by the same, to allow the parties to focus their efforts on finalizing settlement. The parties have reached an agreement in principle to resolve this matter in its entirety but require additional time to finalize the settlement. Counsel for Plaintiff Alexys Taylor (“Plaintiff”) has informed Alcon’s counsel that Plaintiff does not oppose this Motion or the relief requested herein. In support hereof, Alcon states as follows.

1. On June 21, 2021, Plaintiff filed a putative class action complaint (“Complaint”) against Alcon in the Circuit Court of Cook County, Illinois, asserting claims for violation of the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* (Dkt. 1, Ex. A).<sup>1</sup>
2. On July 28, 2021, Alcon filed a Notice of Removal. (Dkt. 1).
3. On August 25, 2021, Alcon filed its Motion to Dismiss Plaintiff’s Complaint and accompanying memorandum of law. (Dkt. 12, 13).

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<sup>1</sup> The action originally included a second plaintiff, America Haileselassie, who was voluntarily dismissed on August 26, 2021. (*See* Dkt. 15).

4. On October 8, 2021, Plaintiff filed an Amended Complaint. (Dkt. 20).

5. The parties engaged in settlement discussions thereafter and, on October 13, 2021, the parties reached a settlement agreement in principle that would resolve this matter in its entirety.

6. To allow the parties to focus their efforts on finalizing the settlement, prevent additional and potentially unnecessary expense to either party, and in consideration of judicial economy, Alcon respectfully requests this Court enter an Order staying the proceedings in their entirety by sixty (60) days, including any deadlines under the Federal Rules of Civil Procedure, Local Rules of the District Court of the Norther District of Illinois, or this Honorable Court, and Alcon's deadline to respond to Plaintiff's Amended Complaint (Dkt. 20, 21) by the same.

7. Alcon's counsel has conferred with Plaintiff's counsel, and Plaintiff does not oppose the requested stay and relief sought herein.

8. No party will be prejudiced by the requested stay.

9. This request is made in the interests of justice and judicial economy, and not for the purposes of delay.

WHEREFORE, Alcon Vision, LLC respectfully requests that this Court enter an Order granting its Unopposed Motion to Stay Proceedings and Deadlines to Finalize Settlement, staying this matter and extending all deadlines by sixty (60) days, and afford such other relief that the Court believes is proper and just.

Dated: October 20, 2021

Respectfully submitted,

ALCON VISION, LLC.

By: /s/ Brian C. Miller  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on October 20, 2021, he or she caused the foregoing ***Alcon Vision, LLC's Unopposed Motion to Stay Proceedings and Deadlines to Finalize Settlement*** to be filed via the Court's ECF system, which will send notification of such filing to and serve all attorneys of record.

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/s/ Brian C. Miller  
One of Its Attorneys